

FILED

DEC 19 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUAN ANTONIO SOTO,

Defendant.

4:19CR1052 JAR/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown, but including October 2019, within the Eastern District of Missouri, and elsewhere,

JUAN ANTONIO SOTO,

the defendant herein, did knowingly and intentionally conspire, combine, confederate and agree with other persons, known and unknown to this Grand Jury, to commit the following offenses against the United States: to distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of methamphetamine, a schedule II controlled substance,

In violation of Title 21, United States Code, Sections 841(a)(1) and 846.

Quantity of Controlled Substances Involved in the Conspiracy

1. The amount of a mixture or substance containing a detectable amount of heroin involved in the conspiracy and attributable to him as a result of his own conduct, and the conduct

of other conspirators, known or reasonably foreseeable to him, is one kilogram or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(i).

2. The amount of a mixture or substance containing a detectable amount of methamphetamine involved in the conspiracy and attributable to him as a result of his own conduct, and the conduct of other conspirators, known or reasonably foreseeable to him, is 500 grams or more, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A)(viii).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count I, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such violation(s).

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

SARA E. KOPPENAAL, #66605MO
Assistant United States Attorney